

Exhibit 1

THE EXPERTS **Robson Forensic**

CHRISTOPHER D. ROCHE
Mechanical/Automotive Engineer

Motor Vehicle Design, Development and Testing: from requirements, concept through validation field-testing of complete vehicles (Internal Combustion Engine and Battery Electric Vehicles), including manufacturing. Passenger cars, light trucks, commercial vehicles including class 2 to 5 cutaway chassis and shuttle buses. Finite Element Analysis (FEA) for structural performance including crash, durability, and Noise Vibration and Harshness (NVH) performance. Failure Mode Effects Analysis (FMEA) for products and process, Design Verification Plan and Report (DVPandR) and specification development, as well as writing repair procedures. Testing pre-production and production vehicles in extreme environments at or above rated capabilities. Federal Motor Vehicle Safety Standard (FMVSS) and other regulatory requirement compliance.

Motor Vehicle System Design, Development and Testing: body structure; front end modules (FEM); closures structure; door hardware; exterior trim; bumper systems; chassis structure; sunroof system; crash energy absorbing structure (front and rear); seat belt and child restraint anchors; luggage retention; side impact; static door retention; airbag sensing; roof crush; fuel or energy system integrity; anti-corrosion; Transfer Path Analysis (TPA); NVH treatment; structural joint (rigid and isolated) definition and compliance. Finite Element Analysis (FEA) for structural performance at a component and system level including processes and methods to achieve model correlation.

Motor Vehicle Failures: structural; seat belt; seat retention; suspension; fatigue durability; local strength; water leak; wind noise; corrosion; latch operation; side impact injury; crash beams; door slam; head impact; roof crush and dynamic rollover and door retention.

Motor Vehicle Repair: diagnosis and/or repair of body and bumper system, closures, window systems, water sealing, door latches, primary and supplemental restraint systems, lighting, interior/exterior components and systems, interaction of dealers and manufacturers, and safety recall repairs. Proper use of service repair tools and equipment, repair procedures and shop operations.

Manufacturing Process and Equipment: stamping; hot forming; roll forming; extrusion; casting; injection molding; vacuum forming; resin transfer molding (RTM); additive manufacturing processes; pneumatic and DC powered tools, hand tools, torque verification means and methods, fit and finish control, statistical process control (SPC), forming simulation, body-in-white (BIW) structural assembly, adhesives; welding (TIG/MIG/RSW), joining (FDS, SPR), machining, mistake and error proofing, poka-yoke, Advanced Product Quality Planning (APQP), operator protection means and methods and operator ergonomics.

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PROFESSIONAL EXPERIENCE

2022 to Present **Robson Forensic, Inc.**
Associate

Provide technical investigations, analysis, reports, and testimony toward the resolution of commercial and personal injury litigation involving vehicle collisions, vehicle crashworthiness and engineering issues, mechanical defects and malfunctions, and vehicle repair issues for passenger cars, light trucks, SUVs, and medium trucks.

2021 to 2022 **Automotive Insight**
Independent Contractor/Program Manager

- BEV supply chain development for startups and EV component business development for various suppliers (Automotive Insight).
- Body system and vehicle safety strategy for a BEV startup (Yeager Mobility).

2017 to 2021 **Optimal**
Director of Engineering Programs

- Concept development leader for a low floor electric bus. Managed a team of engineers to develop a BEV based on a commercially available cutaway chassis. Use of FEA to develop the design to maintain the baseline vehicle crash performance for both structural and occupant performance. A mixed material solution comprising high strength steel and reinforced plastics.
- Lead inventor on a patent application for a low floor electric vehicle platform.
- Chief engineer and PM for the Bollinger Motors B1 project (off-road BEV). Responsibilities included developing program targets, including safety performance at a vehicle and system level. Managed a team of engineers to develop the body, chassis, interior, and powertrain systems. Use of CAD, FEA, and PLM to design and develop the vehicle and maintain the BOM. Extensive benchmarking conducted to establish vehicle attribute targets such as steering and brake feel as well as aerodynamic, NVH and KandC performance.
- Managed the development of a test procedure for vehicle durability performance testing including the choice of PG, the types and frequency of events and number of test cycles. Procedures developed for an off-road BEV and class 4 bus.

2017 **SF Motors**
Director of Body Engineering
Responsible for building a team to develop a brand-new body architecture for an EV in the U.S. and China markets.

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2013 to
2017

Hyundai-Kia Technical Center

Body Structure Manager

- Manager of the body structure team responsible for RandD activities, production vehicle lifecycle management and product development.
- Led the BIW development of a unibody pickup (Santa Cruz) during concept to prototype release phase. Styling feasibility, master section development, specification development and BIW CAD definition to meet program requirements.
- Managed a small team and actively participated in multiple BIW RandD projects such as optimizing the of rear body side assembly to reduce cost and mass with performance maintained. Utilized structural FEA using topology optimization techniques to re-define the major BIW load paths. Developed new CAD geometry.
- Managed a project to develop a new front apron assembly that included the front longitudinal to reduce cost and mass with no loss in structural performance. Working with the steel supplier, a new forming process and AHSS was utilized. Section development, CAD, FEA, and prototype builds were all undertaken. Full vehicle prototypes were developed, and full vehicle crash tests undertaken to verify performance.
- Responsible for a team that developed BIW countermeasures to improve the IIHS small overlap impact performance of a compact car. The focus was on the front bumper, longitudinal, hinge pillar and side sill reinforcement. BIW CAD of a variety of design concepts was developed that were subsequently analyzed using FEA methods to predict structural intrusion performance. The final design improved the structural rating from "Marginal" to "Good". The team was successful in patenting the structural enablers.
- Supported three manufacturing facilities and seven vehicle products to resolve BIW quality issues, including addressing IQS / VDS issues.
- Recipient of the HATCI President's award in 2015 for exceptional contribution

2010 to
2013

Roche Engineering

Owner/CAE Manager

Deployed at SAIC (UK) via contract through Roche Engineering

- Manager of the CAE team responsible for crash, durability and NVH vehicle analysis developing body, interior, and chassis systems to meet program targets.
- Responsible for personnel resource, hardware, software, and CAE strategy including a team of Shanghai based CAE engineers.
- Responsible for all CAE activities related to a new architecture development that was intended to support three vehicle derivatives. Investigated and utilized new CAE methods to explore the design space such as topology optimization and the SFE Concept design tool that allows for major design parameters and can automatically generate the FEA input deck. Process included multi-disciplinary optimization (MDO) routine to find the optimum design variables to meet structural performance targets while minimizing the BIW mass.
- Led the development of a vehicle NVH modal map for body, trim, seats, and chassis systems.

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- Managed the CAE team performing the simulation and provided the interpretation of vehicle crash CAE results to develop a European derivative of a mid-size passenger car (2012 MG6) to meet European regulations and the EuroNCAP targets with a revised and larger diesel powertrain.

2008 to
2010

Hyundai-Kia Technical Center

Senior Body Engineer

- Designed the rear door structure for the all-new 2010 Hyundai Elantra meeting revised FMVSS 214 side impact requirements: responsible through digital design phases, prototype testing lots, pre-launch, and mass production.
- Co-authored a technical paper on front longitudinal system development and optimization utilizing section analysis tools and sub-system FEA modeling techniques.
- Designed and released all structural body parts and assemblies for the refreshed 2010 Hyundai Santa Fe meeting new IIHS bumper test requirements. Responsible through digital design phases, prototype testing lots, pre-launch, and mass production.
- Designed and developed structural enablers to meet new FMVSS 214, 216a and IIHS roof crush ("Good") requirements whilst minimizing cost and weight penalties. Investigated steel based solutions as well as composite designs utilizing structural adhesives.

1999 to
2007

Incat Systems, Inc.

Lead Body Structure Engineer

2000-2007

Worked at Jeep (Daimler Chrysler) via Contract through Incat Systems, Inc.

- Managed a team of engineers with responsibility for the entire BIW structural performance of the 2010 Jeep Grand Cherokee to meet stringent crash, NVH and durability requirements. Collaborated with BIW, CAE, manufacturing, testing, and other teams to develop the system to meet all structural targets: responsible through digital design phases and prototype testing lots.
- Lead structural engineer for the upper body development for the 2008 Dodge Nitro and 2008 Jeep Liberty to meet crash, durability and NVH requirements. Authored multiple compliance reports (207/210, 214 etc.) and supported launch with a focus on spot weld quality and compliance to internal standards.
- Structural engineer responsible for the 2005 Jeep Grand Cherokee front-end structure. Responsible for the development of the front longitudinal sub-system to meet FMVSS requirements and NCAP and IIHS targets. Responsible for the first IFS shock tower structure for a Jeep Grand Cherokee whilst maintaining industry leading off-road durability performance. Released weld and structural adhesive layouts including weld patterns. Ensured the BIW system satisfied all requirements through each program phase including digital design phases, prototype testing lots, pre-launch, and mass production.
- Ensured full FMVSS compliance for seat belt anchorage (207/210), door crush (214) and roof crush (216) for the 2005 Grand Cherokee and Commander.
- Provided structural engineering support during WK launch at the assy. plant including managing weld destruct activities to ensure compliant weld quality.

Body Structure and CAE Engineer

1999-2000